

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 1:19-cr-270</b>
	)	<b>CERTIFICATION OF GIANCARLO</b>
<b>KELLEY ROGERS,</b>	)	<b>GHIONE, ESQ</b>
	)	
<b>Defendant.</b>	)	

I, Giancarlo Ghione, Esq, hereby certify:

- 1) I am a licensed attorney admitted to practice law in the State of New Jersey.
- 2) I am an associate with The Law Office of John McCann which represents Mr. Kelley Rogers in the above captioned matter.
- 3) On March 8, 2021, this office filed a motion for compassionate release on behalf of Defendant Rogers.
- 4) On Monday, September 6, 2021, Mr. Kelley Rogers notified me through SMS text message that he has contracted COVID-19 while being held as a federal detainee in Knox County Indiana.
- 5) Upon learning that Judge O'Grady would require a submission on behalf the government by Monday, September 13, 2021, I submitted a request on September 9, 2021, via email to Sergeant Amy Young who is the federal coordinator for the Knox County Indiana Jail asking for medical records, treatment, and diagnosis as it relates to Defendant Rogers for the last month.

- 6) On September 10, 2021, I called the Knox County Indiana jail requesting to speak with Sergeant Young who was not available. I left a message with the answering officer and was told she would contact me directly when she becomes available.
- 7) William Gullota, on behalf of the United States of America has requested proof that Mr. Rogers has contracted COVID-19 as well as a request for his medical records.
- 8) To date, I have not received any medical records related to Mr. Rogers or have received any communications back from Sgt. Young as it relates to my request for Defendant Rogers medical records.

/s/ Giancarlo Ghione  
Giancarlo Ghione, Esq.

Dated: September 10, 2021